

7. Admit.
8. Admit.
9. Defendant's do not have sufficient information to admit or deny the facts in paragraph 9 and therefore denies the same.
10. Defendant's do not have sufficient information to admit or deny the facts in paragraph 10 and therefore denies the same.
11. Defendant's do not have sufficient information to admit or deny the facts in paragraph 11 and therefore denies the same.
12. Defendant's do not have sufficient information to admit or deny the facts in paragraph 12 and therefore denies the same.
13. Defendant's do not have sufficient information to admit or deny the facts in paragraph 13 and therefore denies the same.
14. Defendant's do not have sufficient information to admit or deny the facts in paragraph 14 and therefore denies the same.
15. Defendant's do not have sufficient information to admit or deny the facts in paragraph 15 and therefore denies the same.
16. Defendant's do not have sufficient information to admit or deny the facts in paragraph 16 and therefore denies the same.
17. Defendant's do not have sufficient information to admit or deny the facts in paragraph 17 and therefore denies the same.
18. Defendant's do not have sufficient information to admit or deny the facts in paragraph 18 and therefore denies the same.

JURISDICTION AND VENUE AS TO STATUTORY INTERPLEADER

19. Admit.

20. Admit.

21. Defendant's do not have sufficient information to admit or deny the facts in paragraph 21 and therefore denies the same.

FACTUAL BACKGROUND

22. Defendant's do not have sufficient information to admit or deny the facts in paragraph 22 and therefore denies the same.

23. Defendant's do not have sufficient information to admit or deny the facts in paragraph 23 and therefore denies the same.

24. Defendant's do not have sufficient information to admit or deny the facts in paragraph 24 and therefore denies the same.

25. Admit.

26. Admit.

27. Defendant's do not have sufficient information to admit or deny the facts in paragraph 27 and therefore, denies the same.

a) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27a and therefore, denies the same.

b) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27b and therefore, denies the same.

c) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27c and therefore, denies the same.

d) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27d and therefore, denies the same.

e) Admit.

f) Admit.

- g) Admit
 - h) Admit.
 - i) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27i and therefore, denies the same.
 - j) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27j and therefore, denies the same.
 - k) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27k and therefore, denies the same.
 - l) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27l and therefore, denies the same.
 - m) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27m and therefore, denies the same.
 - n) Defendant's do not have sufficient information to admit or deny the facts in paragraph 27n and therefore, denies the same.
28. Defendant's do not have sufficient information to admit or deny the facts in paragraph 28 and therefore denies the same.
29. Defendant's do not have sufficient information to admit or deny the facts in paragraph 29 and therefore denies the same.
30. Defendant's do not have sufficient information to admit or deny the facts in paragraph 30 and therefore denies the same.

COUNT I: INTERPLEADER

31. Defendants restate their answers from above.
32. Defendants do not have sufficient information to admit or deny the facts in paragraph 32 and therefore denies the same.

- a) Defendant's do not have sufficient information to admit or deny the facts in paragraph 32a and therefore denies the same.
- b) Defendant's do not have sufficient information to admit or deny the facts in paragraph 32b and therefore denies the same.
- c) Defendant's do not have sufficient information to admit or deny the facts in paragraph 32c and therefore denies the same.
- d) Defendant's do not have sufficient information to admit or deny the facts in paragraph 32d and therefore denies the same.
- e) Admit.
- f) Admit.
- g) Admit.
- h) Admit.
- i) Defendant's do not have sufficient information to admit or deny the facts in paragraph 32i and therefore denies the same.
- j) Defendant's do not have sufficient information to admit or deny the facts in paragraph 32j and therefore denies the same.
- k) Defendant's do not have sufficient information to admit or deny the facts in paragraph 32k and therefore denies the same.
- l) Defendant's do not have sufficient information to admit or deny the facts in paragraph 32l and therefore denies the same.
- m) Defendant's do not have sufficient information to admit or deny the facts in paragraph 31m and therefore denies the same.
- n) Defendant's do not have sufficient information to admit or deny the facts in paragraph 31n and therefore denies the same.

33. Defendant's do not have sufficient information to admit or deny the facts in paragraph 33 and therefore denies the same.

34. Defendant's do not have sufficient information to admit or deny the facts in paragraph 34 and therefore denies the same.

35. Defendant's do not have sufficient information to admit or deny the facts in paragraph 35 and therefore denies the same.

FURTHER ANSWER AND AFFIRMATIVE DEFENSE

Comes now Defendants, by and through their attorney, and for their further answer and affirmative defenses states as follows:

1. For his further affirmative defense, these Defendants state hypothetically and in the alternative without admitting any facts alleged in Plaintiff's Petition and while continuing to deny the same that Plaintiff's Petition fails to provide definitions of the term "accident," or "each accident" or other terms used in the policy identified within and, as such, the Plaintiff fails to state a cause of action.

2. For his further affirmative defense, these Defendants state hypothetically and in the alternative without admitting any facts alleged in Plaintiff's Petition and while continuing to deny the same that Plaintiff's Petition fails to provide definitions of "accident," "each accident" or other terms used in the policy identified within. As such, the language should be interpreted to mean that the terms of the policy should be interpreted such that each impact in the within collision should be considered a separate accident thereby triggering a new policy limit for each impact. Alternatively, the language in the policy at issue is ambiguous and therefore should be interpreted against Plaintiff with a finding that each impact with each separate Defendant driver as alleged by Plaintiff should be considered a separate accident and trigger an additional policy limit.

WHEREFORE, having fully answered Plaintiff's Petition, Defendants prays the Court enter its order dismissing this case or for any further orders as this Honorable Court deems just and proper under the circumstances.

Respectfully submitted,

PAGE LAW, LLC

/s/ Andrew T. Drazen

Andrew T. Drazen, #59879MO

9930 Watson Rd. Ste. 100

St. Louis, MO 63126

Office: 314-835-5800

E-Fax: 314-835-5853

andy@pagelaw.com

*Attorney for Defendants Edward J. Hunter,
Rebecca Hunter, Maxwell W. Hunter and
L.H., a minor*